

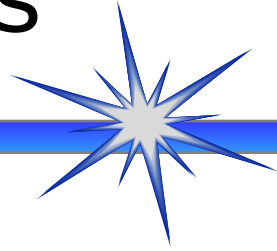
Resource Conservation and Recovery Act and Munitions Rule Training

Navy Region Southwest

RCRA,
State &

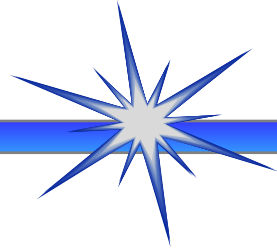
Providing Environmental
Support to our War Fighters

Presentation Objectives



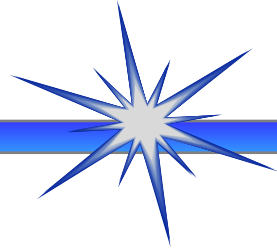
- Define how and when a material becomes a solid waste and a hazardous waste under the Resource Conservation and Recovery Act (RCRA)
- Describe conditions under which military munitions can become waste military munitions (WMM) (a solid waste) and potentially become a RCRA hazardous waste
- Understand basic RCRA rules pertaining to generators, transporters, and Treatment, Storage, and Disposal (TSD) facility operators

Sanctions for Noncompliance



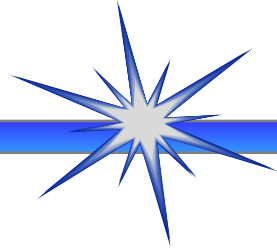
- RCRA is a law and 40 Code of Federal Regulations (CFR) Parts 260-82 are its regulations
- Violations can be, and are, prosecuted
 - Civil sanctions can be levied upon the installation and/or individuals
 - Criminal sanctions can be brought against individuals
- Regardless, obeying the law is the right thing to do
 - Preserves resources for long-term use
 - Provides for a safer environment for all of us

Presentation Outline



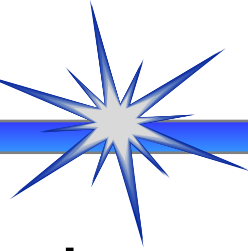
- **RCRA basics**
- EPA's Military Munitions Rule (MR) and DoD's Munitions Rule Implementation Policy (MRIP)
- When munitions are not WMM
- When unused munitions are a WMM
- The Designated Disposition Authority (DDA) process
- When used/fired munitions are a WMM
- Special circumstances involving WMM
- When WMM are a hazardous waste
- MRIP guidance on generating, transporting, storing, and treating WMM

What RCRA Does



- Defines solid waste and classifies it as hazardous and non-hazardous
- Sets standards for generators and transporters of hazardous waste
- Sets standards for TSD facilities
- Identifies requirements for “cradle-to-grave” management
- Authorizes most states to manage their own RCRA programs

When Something Becomes a Solid Waste



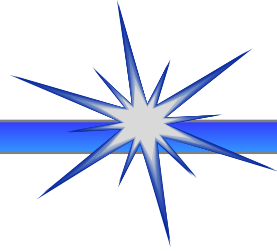
- When discarded by being abandoned, recycled, or is “inherently waste-like”
- Examples:
 - A dry-erase marker tossed into a trash can
 - Spent solvent drained from a degreaser
 - Sludge left in an industrial processing vat
- Can be solid, liquid, or gas

When a Solid Waste is a Hazardous Waste



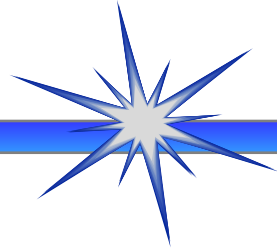
- Waste is not excluded or exempted by RCRA
 - Scrap metal
 - Household waste
- Waste is either a:
 - Characteristic waste →
 - Listed waste
 - 2,4-Dinitrotoluene
 - Nitroglycerine
 - Phosgene

Quiz



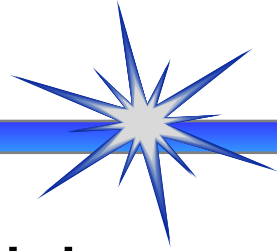
1. What types of penalties can result from violating RCRA?
2. Which of the following is not a criteria for something being a solid waste?
 - It's abandoned
 - It's inherently waste-like
 - It's recycled
 - It's unserviceable

Presentation Outline



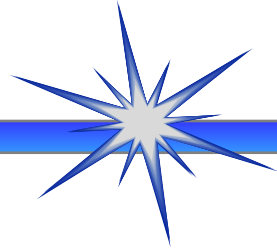
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MR Essentials (1)



- Congress amended RCRA in 1992 with the Federal Facility Compliance Act (FFCA)
- Key provisions of FFCA:
 - Created a “waiver of sovereign immunity” with regard to civil and criminal sanctions under RCRA
 - Directed the EPA to first consult with DoD and the States and then develop the MR

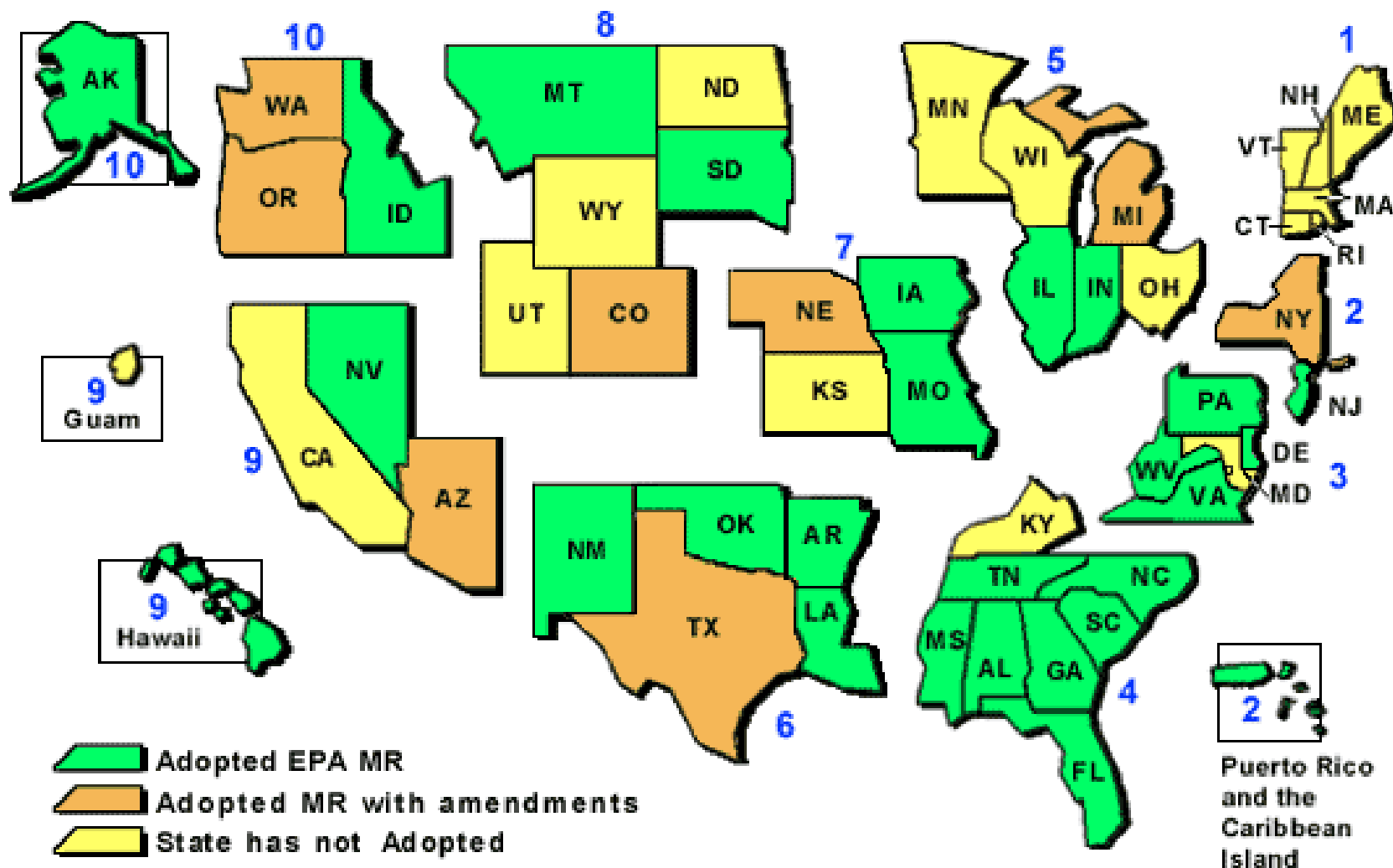
MR Essentials (2)



- Purpose of the MR
 - Identify when conventional and chemical military munitions become a WMM and a hazardous waste under RCRA
 - Provide for the safe storage and transport of WMM
- MR is not a national standard
 - Authorized States may choose to adopt the Federal MR as a minimum or introduce more restrictive standards
 - This training covers the Federal MR, CA and NV requirements

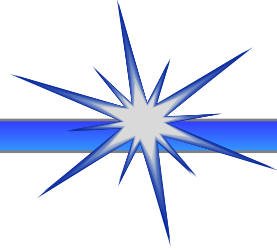
State Adoption Status

(current as of 10 Feb 03)



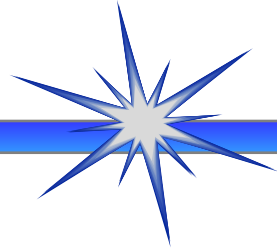
Graphic courtesy of
<http://aec.army.mil/usaec/range/popup/munitionsmap.html>

MR Implementation Policy (MRIP) (1)



- Developed by DoD and all four Services to interpret and implement the Federal MR
- Writing committee drawn from environmental, EOD, explosives safety, legal, munitions, and operational communities
- Published without DoD number
 - To expedite dissemination and use
 - Currently distributed with Service cover letter containing implementation instructions
- Soon to be revised and re-published as DoD regulation

MRIP (2)



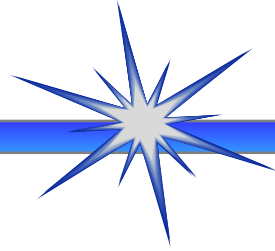
- Establishes overarching DoD policy for managing WMM
- Intended to ensure consistency from state to state and within DoD
- Contents:
 - References and acronyms
 - Chapters covering each major point of the MR
 - Glossary
 - Appendices
 - Figures

Before the MR “When’s” (1)



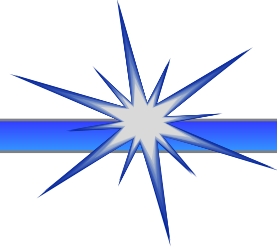
- Before MRIP applies, one must establish the item is a “military munition”
- Done with three questions:
 1. Is the item an “ammunition product or component”?
 2. Was the item “produced or used by or for” the DoD?
 3. Was the item produced or used “for national defense and security”?

Before the MR “When’s” (2)



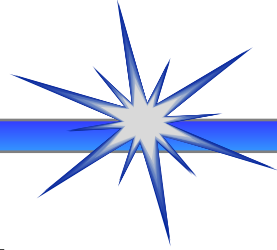
- Military munition:
 - Includes confined gaseous, liquids, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions, and dispensers, demolition charges, and devices and components thereof

Before the MR “When’s” (3)



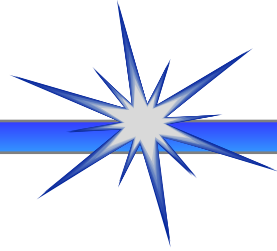
- Military munition does not include
 - Improvised explosive devices (IEDs)
 - Nuclear weapons
 - Wholly inert munitions
- Items that may or may not be military munitions
 - Manufacturing; research, development, test & evaluation (RDT&E); and renovation rejects or residues
 - Foreign military munitions
 - Amnesty program turn-ins
 - Non-military munitions

Before the MR “When’s” (4)



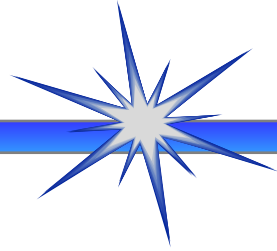
- Must also define a “military range”
 - Designated land or water area (does not include air space)
 - Areas set aside, managed, and used to:
 - Conduct RDT&E of military munitions,
 - Train military personnel in use and handling of military munitions
 - Ranges include: impact areas, firing lines/positions, maneuver areas, test pads, detonation pads and buffer zones

Quiz



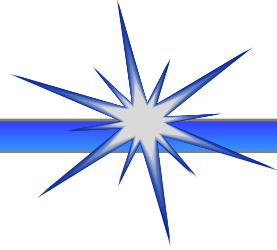
- Which of these are military munitions?
 1. Hand grenade recovered from an amnesty box
 2. Small arms ammunition used by local Rod and Gun Club
 3. Artillery projectiles used in avalanche control
 4. Torpedo training mockup
 5. RDT&E test residue
 6. Jet Assisted Take Off (JATO) bottle
 7. Commercial fireworks
 8. Improvised Explosive Device (IED)
 9. Nuclear weapon
 10. Massive Ordnance Air Blast Bomb (MOAB)

Presentation Outline



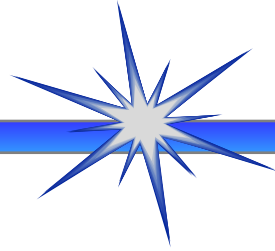
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When Munitions are *Not* WMM (1)



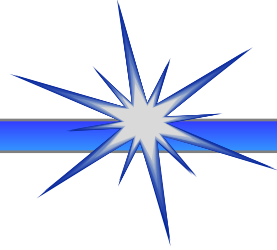
- When stockpiled for operations or required training
 - Why? RCRA does not apply to “products” and unused munitions are considered “products”
 - All stored items are stockpiled “products”
 - The exception to this would be items classified Condition Code “V” or Disposition Authorization Code “M”

When Munitions are Not WMM (2)



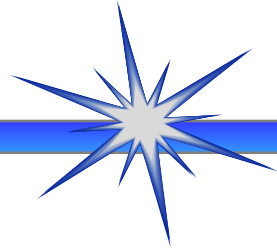
- When used for its intended purpose
 - Required personnel (read: documented) training
 - Individual proficiency training
 - Standard unit (read: documented) training/exercises
 - Crew qualification
 - Team training and certification
 - Destruction of unused propellant
 - Emergency destruct and combat disposal
 - RDT&E activities

When Munitions are *Not* WMM (3)



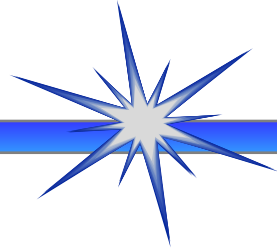
- More intended purposes
 - Range (active and inactive) clearance activities
 - Recovery, collection, and destruction
 - On-range crushing, shredding, and flashing okay...**but not burial**
 - Unused munitions and their components that are repaired, reused, reclaimed, or subject to resource recovery and recycling (R3) programs

Quiz



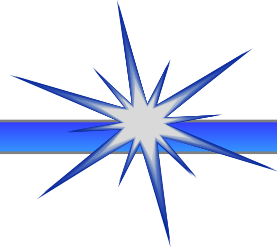
1. Why is use of explosives in EOD proficiency training not a waste management activity?
2. What actions are required of personnel conducting burning (i.e., combat disposal) of unused propellant increments as part of live-fire artillery training?
3. When is a range clearance operation a regulated activity?

Presentation Outline



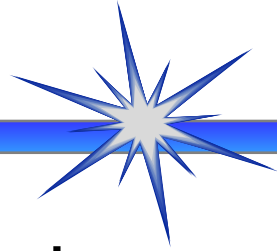
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Unused Munitions (1)



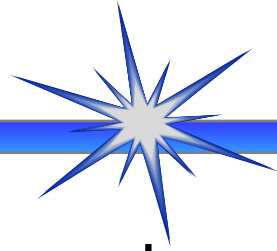
- Unused military munitions become WMM when:
 - Abandoned by being disposed of
 - Buried, land filled, etc.;
 - Burned or incinerated; or
 - Treated prior to disposal
 - Removed from magazine:
 - To be disposed of; or
 - To be treated prior to disposal
 - Known as the “igloo door rule”

Unused Munitions (2)



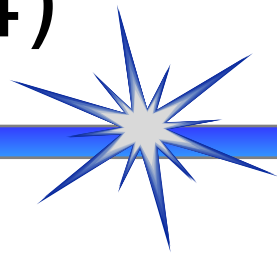
- Unused military munitions are WMM when (cont'd):
 - Declared a waste by an Authorized Military Official (AMO)
 - Example: M55 rockets
 - Declared damaged or deteriorated to the point it becomes unserviceable or cannot be recycled
 - Example: Urgent Notice of Ammunition Reclassification (NAR)

Unused Munitions (3)



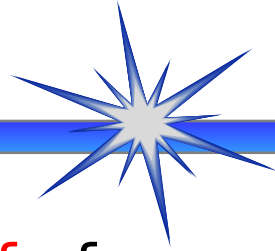
- Naval Operational Logistics Support Command (NOLSC) (formerly NALC) issues NARS for a specific population such as a specific lot, group of lot numbers, or all lots within a specific ammunition family or code
 - To reclassify to restricted use
 - To reclassify munitions to unserviceable condition or
 - Release munitions back to unrestricted status
- Similar documents include:
 - Ammunition Information Notices (AINs)
 - Technical Orders (TOs)

Unused Munitions (4)



- Urgent NARs
 - Also known as Emergency Destruct NARs
 - Driven solely by explosives safety considerations
 - Issued via “op-immediate” precedence message
- Urgent NARs address munitions that are “damaged or deteriorated beyond repair”
 - Munitions become WMM immediately upon issuance and must be managed as Explosive Hazardous Waste per MRIP

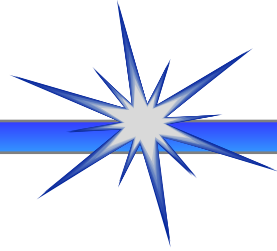
Unused Military Munitions (4)



- Example Urgent NAR: “This ammunition is **unsafe** for storage, transportation or handling after 60 days (or date). **After 60 days (or date), the munition must be handled as EOD immediate response** and emergency treatment permits would be required from the state or local EPA. All possible action for treatment prior to 60 days (or date) is directed. **This munition is a hazardous waste and must be managed in accordance with the MRIP** for all shore activities within the US and its territories, or in accordance with foreign Status of Forces Agreement, or shipboard procedures, as applicable. The DDA and IM is as follows...”*

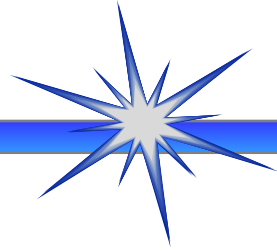
*NAVSUP P-724: Conventional Ordnance Stockpile Management, Ch 5 Sect 9

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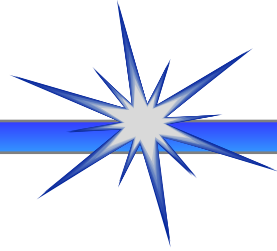
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The DDA Process (1)



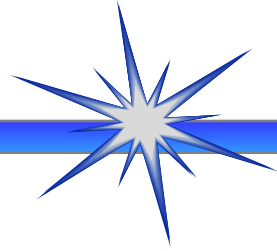
- The DDA:
 - Only authority (in most cases) allowed to declare when unused military munitions become WMM
 - Ensures all efforts are made to use the unused item prior to declaring it a WMM

The DDA Process (2)



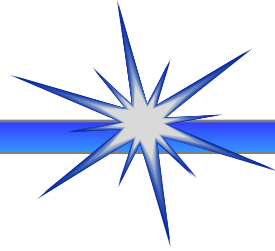
- Directs inspection and safety evaluation
- Directs reuse, as appropriate:
 - Inter-service training
 - Intra-service transfer
 - Foreign military sales (FMS)
- Directs R3 option, as appropriate
- If no other use, Service DDAs may:
 - Refer to DoD DDA for action or
 - Designate as WMM and order treatment (locally or regionally)

The DDA Process (3)



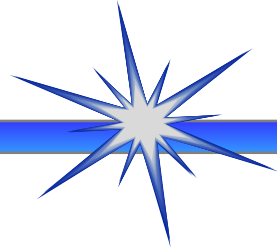
- Upon DDA designation as waste, WMM unique inventory codes should be used
 - Condition Code (CC) “V” or Disposition Authorization Code (DAC) “M”
 - Note: CC “H” means “unserviceable” and does not equal WMM
- Once declared a waste, item or container must be
 - Clearly marked as WMM and
 - Segregated from serviceable stocks

Quiz



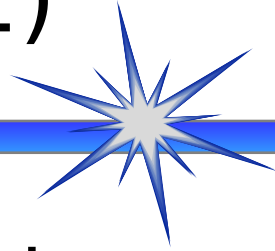
- True or false
 1. A munition that is the subject of an urgent NAR—and designated as hazardous waste—is not a WMM until it leaves the magazine on its way to be treated
 2. The DDA is the only authority, in most cases, to declare an item as a WMM
 3. A damaged or deteriorated munition can be designated a WMM by local munitions managers
 4. A field activity with a permitted OB/OD site can treat unused munitions without going through DDA process

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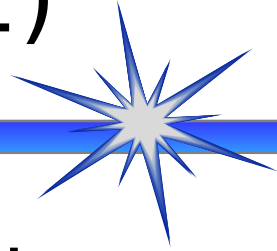
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Used/Fired Munitions (1)



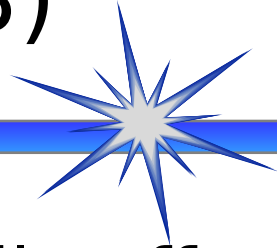
- Used/fired munitions include those that have been:
 - Fired, dropped, launched, projected, placed, or otherwise used
 - Those, when used as intended, malfunction or misfire (e.g., fail to fire or detonate)
- Also includes munitions fragments, such as shrapnel, casings, fins, and other components

Used/Fired Munitions (2)



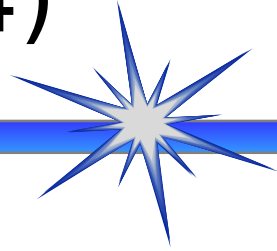
- Used/fired munitions are a WMM when:
 - Recovered, collected, and transported off range or from the site of use, for the purposes of storage, reclamation, treatment, disposal, or treatment prior to disposal;
 - Recovered, collected, and then disposed of by burial, or landfilling either on or off a range, or...

Used/Fired Munitions (3)



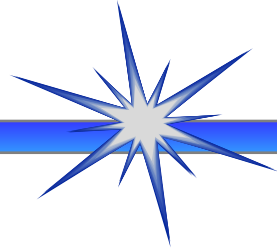
- ...when landing off-range (not necessarily off target) and not promptly rendered safe and/or recovered
 - Immediate action required
 - Respond as promptly as situation demands
 - Assess extent of threat to human health and the environment
 - Carry out appropriate response
 - Maintain a record of events until munitions are recovered or destroyed

Used/Fired Munitions (4)



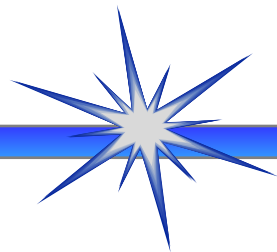
- Misfires fall under used/fired category
 - Occasionally occur during training
 - Misfired munitions are often transported off-range for repair, reuse, or additional evaluation (e.g., malfunction or misfire investigations, failure analysis, or testing for RDT&E purposes)
 - Not automatically classified as WMM
 - Classified into the appropriate condition code upon completion of the required evaluation
 - Depending on the classification action taken, installation in physical possession of the munitions may have to request disposition instructions from the appropriate DDA

Managing Range Scrap (1)



- As a used/fired category munition, range scrap becomes a waste when removed from the range unless recycled using one of two RCRA exclusions
- “Processed scrap metal” exclusion
 - 40 CFR 261.4(a)(13)
 - Excludes recyclable materials from RCRA waste determination requirements, (i.e., scrap metal removed from ranges for recycling never become solid wastes)
 - Use encouraged by DoD Hazardous Waste Management Subcommittee

Managing Range Scrap (2)



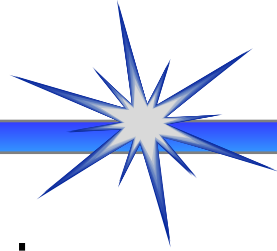
- 40 CFR 261.4(a)(13) exclusion assumes:
 - Scrap metal is certified inert
 - Scrap metal is being recycled (and not accumulated speculatively)
 - Scrap metal contains no low-level radioactive materials
- Approach
 - Waste characterization is not necessary
 - Applicability in CA being evaluated

Managing Range Scrap (3)



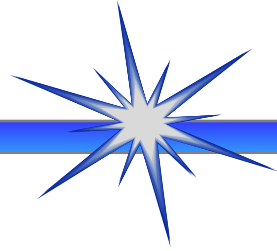
- 40 CFR 261.6(a)(3)(ii) “recyclable materials—scrap metal” exclusion
 - Recycled scrap metal is not subject to generator, transporter, and permitting requirements
 - Applicable regardless of hazardous waste characteristics
 - Intended for scrap metal not excluded under 40 CFR 261.4(a)(13)
- Approach
 - No waste determination and disposition records required
 - Applicability in CA being evaluated

Quiz



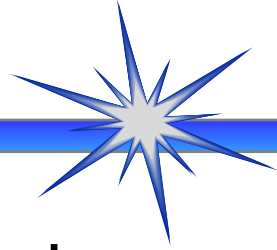
- During test operations, a warhead malfunctions and is removed from the range/test site to determine cause of failure
 1. Is the warhead considered a used or unused munition?
 2. At what point would it become a WMM?
- During an active range clearance, inspected and certified munitions scrap is piled in a remote corner of the range awaiting off-range shipment for recycling
 1. At what point would this material be considered a solid waste?

Presentation Outline



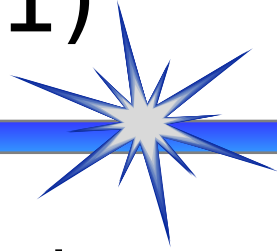
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Special Circumstances Involving WMM



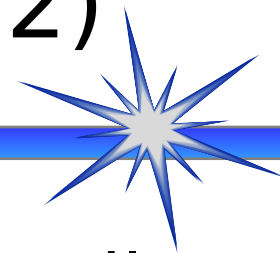
- Emergency responses to incidents involving munitions or explosives
- Munitions manufacturing
- Military munitions managed by contractors
- WMM on ranges designated “other than operational” (formerly closed, transferred, or transferring ranges)

Emergency Responses (1)



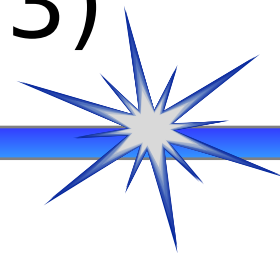
- DoD policy is to provide technical support for explosives or munitions emergency responses to military, federal, state, and local law enforcement and emergency response authorities when requested
- The MR recognized this and codified long-standing exemptions to RCRA requirements for explosives or munitions emergency response personnel

Emergency Responses (2)



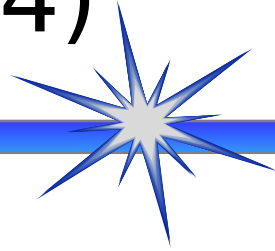
- All requests handled as an emergency until the senior responding emergency response specialist present declares otherwise
 - Level 1 limited to unsecured munitions and those threatening human health and the environment
 - Level 2 response appropriate when “immediate response” is not required, but where there is “imminent and substantial endangerment to human health and the environment”

Emergency Responses (3)



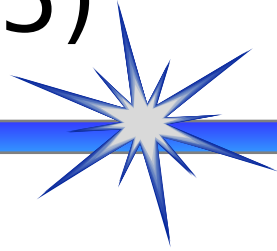
- With Level 1, “reasonable delays” are allowed for extenuating circumstances (e.g., adverse weather)
 - MR allows for “temporary” storage without a storage permit
 - Storage site must be in a “safe and secure” environment
 - Must observe prohibition on storing non-military munitions
 - (See DoD Directive 6050.8)

Emergency Responses (4)



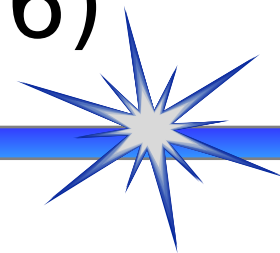
- Immediate response (Level 1)
 - EPA exempts generator, transporter, and permit (including emergency permits) requirements during immediate response
 - Further management subject to RCRA
 - Temporary storage during emergency responses exempt from RCRA permitting requirements
 - If response can be delayed without increasing risk, emergency permit may be required

Emergency Responses (5)



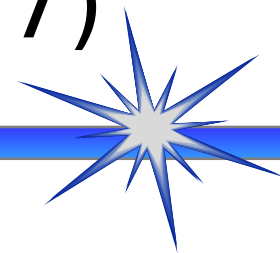
- Imminent and substantial endangerment (Level 2)
 - Emergency permit is necessary in CA, but not NV
 - Can be issued orally, with written permit issued within 5 days
 - Good for up to 90 days
 - TSD facility operating permit (RCRA Subpart X) not required for safe disposal areas (SDA's) used for emergency responses
 - Even if used repeatedly and/or routinely

Emergency Responses (6)



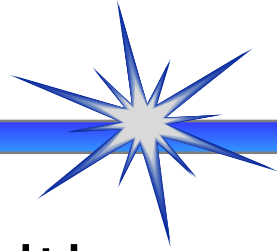
- Residual contamination
 - Potentially subject to RCRA
 - DoD or military Service responsible if a military munition
 - If non-military munition, owner of the item, the property owner, or the requestor for an emergency response responsible
 - Note: Responding unit need not address residual contamination

Emergency Responses (7)



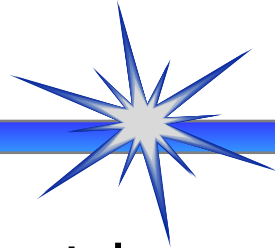
- RCRA Corrective Action
 - During emergency response, RCRA corrective action is not required
 - Emergency permit action does not trigger RCRA corrective action
- EOD assistance to civilian authorities
 - Memorandums of Understanding (MOUs)
 - EOD units coordinate MOU with Regional Environmental Coordinator (REC)
 - EOD units to elevate issues not resolved in MOU

Other Special Circumstances



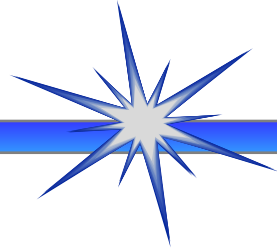
- MR covers munitions manufacturing activities
 - Rejects and residues from military munitions manufacturing are subject to MR
 - Materials produced incidental to manufacturing, RDT&E, or renovation processes are not military munitions and not subject to the MR
- MR covers munitions managed by contractors
 - If managing military munitions; and
 - Are doing so under contract to DoD or a Service
- MR deferred management of UXO left on “other than operational” ranges

Quiz



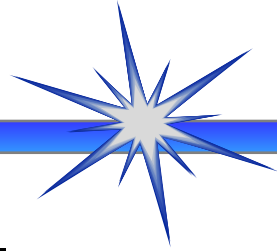
- An EOD team responds downtown to a request by the police department to render safe an IED
 1. Do they need a RCRA emergency permit?
 2. Do they have to address residual contamination?
- A Navy base decides to dredge out an eroding shoreline and encounter munitions in the process
 1. Who should determine if a Level 1 or Level 2 emergency response is required when munitions are uncovered in the process?
 2. What would be some good management pre-planning steps to take prior to beginning the dredging operation?

Presentation Outline



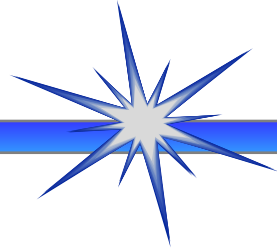
- RCRA basics
- EPA's MR and DoD's MRIP
- When munitions are not WMM
- When unused munitions are a WMM
- The DDA process
- When used/fired munitions are a WMM
- Special circumstances involving WMM
- **When WMM are a hazardous waste**
- MRIP guidance on generating, transporting, storing, and treating WMM

When WMM are a Hazardous Waste



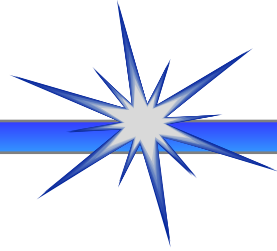
- Neither the MR nor MRIP specifically address determining whether munitions are a hazardous waste
 - This is basic RCRA
- Most military munitions that are a solid waste have fillers that are either:
 - Reactive
 - Toxic

Presentation Outline



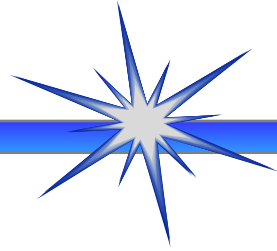
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- **MRIP guidance on generating, transporting, storing, and treating WMM**

MRIP Guidance on Generating WMM



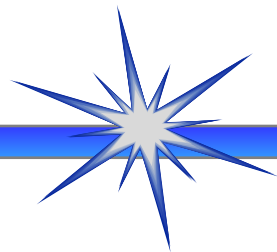
- Conduct a hazardous waste determination
 - Apply “user knowledge”
 - Consult with installation environmental office
 - Field testing or laboratory analysis may be required

MRIP Guidance on Transporting WMM (1)



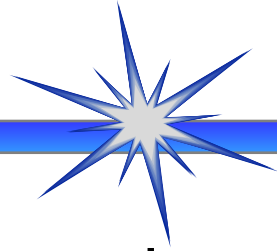
- On-site activities are exempted from RCRA transporter requirements
- MR expanded on-site manifesting exemption to include transportation to contiguous, though separated, parts of an installation

MRIP Guidance on Transporting WMM (2)



- Two transportation options:
 - Comply with traditional RCRA transportation requirements
 - Comply with the MR transportation conditional exemption (CE) requirements, if available

MRIP Guidance on Transport: Traditional RCRA



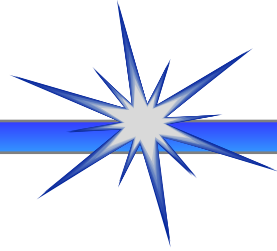
- Traditional hazardous waste transporters must:
 - Have an EPA or state ID number
 - Not accept hazardous waste unless accompanied by a manifest
 - Sign and date the manifest acknowledging acceptance of the hazardous waste from the generator
 - Ensure that the manifest accompanies the hazardous waste
 - Return a signed copy to the generators before leaving the generator's property
 - Keep a copy of the manifest for three years

MRIP Guidance on Transport: MR CE (1)



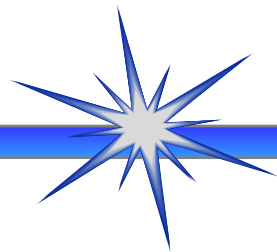
- Eligibility for transporting WMM under the MR transportation Conditional Exemption:
 - WMM cannot be chemical agents or chemical munitions
 - WMM must be transported from a military-owned or operated installation to a military-owned or operated TSD facility
 - All states through which the WMM travel must have adopted this CE (this excludes California)
 - WMM must be transported IAW DoD shipping controls

MRIP Guidance on Transport: MR CE (2)



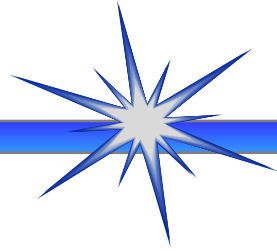
- DoD shipping controls that apply
 - Government Bill of Lading (GBL) (GSA Standard Form 1103)
 - DoD Requisition Tracking Form (DD Form 1348)
 - DoD Single Line Item Release/Receipt Document (DD Form 1348-1A)
 - Signature and Tally Record (DD Form 1907)
 - Special Instructions for Motor Vehicle Drivers (DD Form 836)
 - Motor Vehicle Inspection Report (DD Form 626)

MRIP Guidance on Transport: MR CE (3)



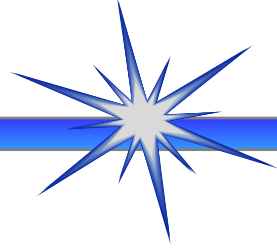
- Transportation CE does not
 - Effect regulatory status for WMM storage, treatment, or disposal
 - Exempt transporter from DOT requirements
- Shipments to commercial facility not covered under CE
 - Must be manifested
- If CE shipment not received in 45 days
 - Receiving facility must report to regulators within 5 days
 - Sending installation must notify receiving installation of shipment date

MRIP Guidance on Transport: MR CE (4)



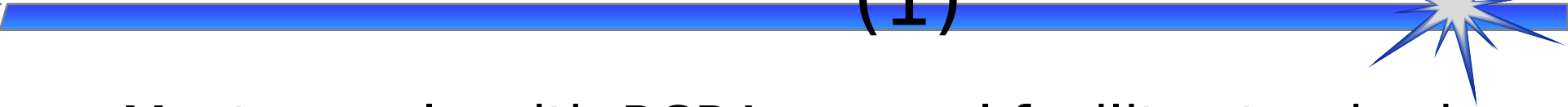
- Failure to meet all conditions of CE
 - Oral notice to regulators within 24 hrs from time owner or operator becomes aware of:
 - Loss or theft of the WMM
 - Failure to meet any condition of the CE
 - Follow up within 5 days with written report to regulators
 - Circumstances of the violation
 - Nature of corrective action
 - Assessment of the likelihood of recurrence
- Installations may apply for CE reinstatement
 - Full RCRA requirements apply until CE reinstated

MRIP Guidance on Storing WMM



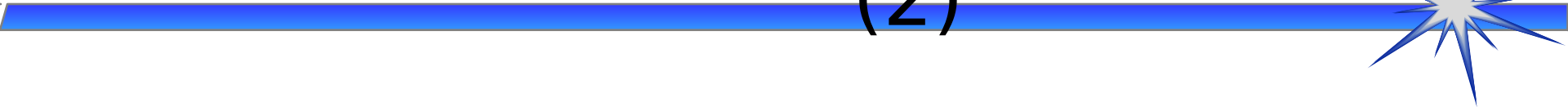
- Three storage options:
 - Traditional RCRA storage
 - Storage by TSD permit
 - <90-day accumulation site
 - Satellite accumulation site
 - Subpart EE storage requirements, if available
 - CE storage requirements, if available
 - Least expensive; most preferred

MRIP Guidance on Storing: Traditional RCRA (1)



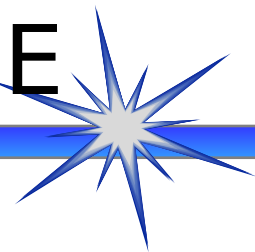
- Must comply with RCRA general facility standards
 - EPA or State identification number
 - Procedures to characterize wastes
 - Security
 - Inspections
 - Personnel training
 - Preparedness and prevention measures
 - Emergency procedures
 - Manifest system, recordkeeping and reporting
 - Corrective action plans
 - Closure/Post-closure plans

MRIP Guidance on Storing: Traditional RCRA (2)



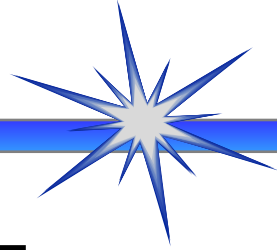
- Traditional HW storage facilities must also have:
 - Completely enclosed facility
 - Chemically compatible surfaces
 - Effective barriers installed
 - Totally compatible storage
 - RCRA inspection requirements
 - Operating log

MRIP Guidance on Storing: RCRA Subpart EE



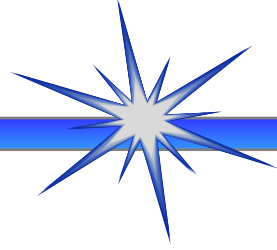
- Available for use by all facilities managing waste munitions, not just military facilities
- A tailored standard based partly on Department of Defense Explosive Safety Board (DDESB) standards, partly on RCRA standards
- Used instead of traditional RCRA permit or interim status for ≥ 90 -day storage
- Installations to use Subpart EE for storage of waste chemical munitions and WMM that do not qualify for MR storage CE

MRIP Guidance on Storing: MR CE (1)



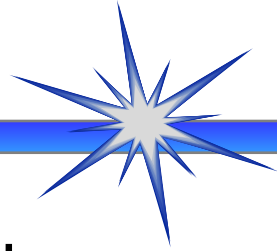
- Storage eligibility under the MR storage CE:
 - WMM cannot be chemical agents or chemical munitions
 - WMM must be subject to DDESB jurisdiction and stored IAW DDESB standards
 - Owner or operator must notify regulators within 90 days of first storing WMM
 - Owner or operator must conduct annual inventories, quarterly inspections, and recordkeeping
 - Access limited to trained and authorized personnel

MRIP Guidance on Storage: MR CE (2)



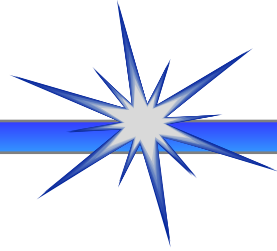
- Further conditions:
 - CE must be adopted by the regulating (State) agency, thus valid in Nevada, but not California
 - No DDESB waivers/exemptions on CE magazine
 - Written notification to regulators of CE use
 - Report explosive safety concerns to regulators and grant them access
 - Also required:
 - CE storage records must be maintained for 3 years
 - Safety, security, and environmental SOPs
 - Notify regulators when storage units no longer used to store waste munitions

MRIP Guidance on Storage: MR CE (3)



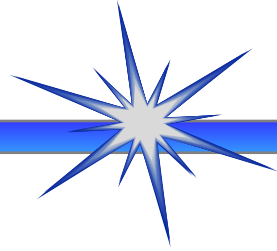
- To demonstrate compliance with the CE, the owner or operator must:
 - Have up-to-date copy of DD 6055.9-STD
 - Have DDESB-approved site plan
 - Show magazines used for CE on site map
 - Have on file last DDESB explosives safety survey report
 - Keep up-to-date records
 - Correspondence with regulators
 - Inventory and self-inspection records
 - Rosters of trained and authorized personnel
 - CE reinstatement letters/documentation

MRIP Guidance on Storage: MR CE (4)



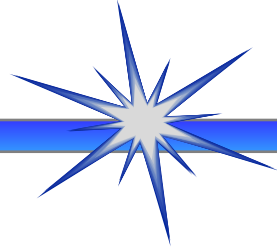
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MRIP Guidance on Treatment (1)



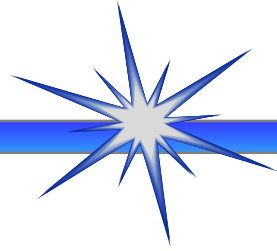
- MR makes no changes to treatment requirements
- Treatment or disposal requires a RCRA permit (interim or final) unless
 - Treatment part of the immediate response to a munitions or explosive emergency
 - Treatment is an extension of RDT&E activities

MRIP Guidance on Treatment (2)



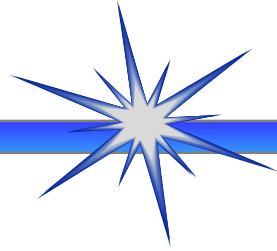
- Treat all waste munitions IAW RCRA
- Installations are responsible for:
 - Obtaining and maintaining each permit
 - Permit only IAW Service's munitions treatment facility strategic plan
 - Negotiating and implementing corrective action requirements
 - Executing closure
 - Preparing and implementing contingency plans and emergency procedures
 - Establishing inspection procedures

We're Done!



- RCRA basics
- EPA's MR and DoD's MRIP
- When munitions are not WMM
- When unused munitions are a WMM
- The DDA process
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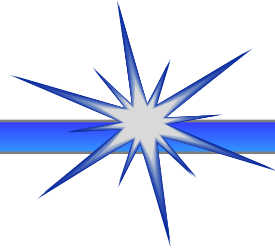
Take Home Message



- The MR can be of benefit to DoD
- Strict compliance is vital
- Just remember the “when’s”:

When Munitions are <i>NOT</i> a Waste	When <u>Unused</u> Munitions <i>ARE</i> a Waste	When <u>Used/Fired</u> Munitions <i>ARE</i> a Waste
• Munitions stockpiled for ops and training • Munitions used for their “intended purpose”	• When abandoned by burial, treatment, or disposal • When removed from a magazine to be treated • When deteriorated/damaged and cannot be repaired or recycled • When declared a solid waste by the Service or DoD DDA	• When recovered and removed from a range for anything but recycling or evaluation • When buried or landfilled • When landing off range and not “promptly” recovered

Questions



- If you have questions, please contact your installation Environmental Office.